

**REMARKS**

In the non-final Office Action, the Examiner re-opened prosecution after the filing of an Appeal Brief by Applicants; rejected claims 1, 8-12, 16, 20-24, 26-29, 31, and 33-35 under 35 U.S.C. § 102(e) as anticipated by Corneille et al. (U.S. Patent Application Publication No. 2005/0073982); and rejected claims 2 and 18 under 35 U.S.C. § 103(a) as unpatentable over Corneille et al. in view of Hochmuth et al. (U.S. Patent Application Publication No. 2003/0055968).

By this Amendment, Applicants amend claims 2, 8-10, 12, 21-24, 26-29, 31, and 35 to improve form. Applicants traverse the Examiner's rejections under 35 U.S.C. §§ 102 and 103. Claims 1, 2, 8-12, 16, 18, 20-24, 26-29, 31, and 33-35 remain pending.

*REJECTION UNDER 35 U.S.C. § 102 BASED ON CORNEILLE ET AL.*

In paragraph 3 of the Office Action, the Examiner rejected claims 1, 8-12, 16, 20-24, 26-29, 31, and 33-35 under 35 U.S.C. § 102(e) as allegedly anticipated by Corneille et al. Applicants traverse the Examiner's rejection.

Independent claim 23 is directed to a system that comprises a service gateway in communication with a first entity and a second entity. The service gateway comprises a first interface module to receive, from the first entity, a message requesting performance of a service in an extensible set of services offered by the second entity, the message including a service name that corresponds to the service and an argument that includes data used to perform the service; an access control module to make a first determination of whether the first entity is permitted to request performance of the service corresponding to the service name, make a second determination of whether the argument is permitted to be provided by the first entity, and

make a third determination of whether the argument is permitted to be requested for the service corresponding to the service name; and a second interface module to selectively request performance of the service by the second entity based, at least in part, on results of the first, second, and third determinations of the access control module.

Corneille et al. does not disclose the combination of features recited in claim 23. For example, Corneille et al. does not disclose a service gateway that includes, for example, an access control module to make a first determination of whether a first entity is permitted to request performance of the service corresponding to the service name, make a second determination of whether the argument is permitted to be provided by the first entity, and make a third determination of whether the argument is permitted to be requested for the service corresponding to the service name, as recited in claim 23.

The Examiner alleged that Corneille et al. discloses these features and cited paragraphs 0014, 0033, and 0129 of Corneille et al. for support (Office Action, pages 7-8). Applicants submit that the disclosure of Corneille et al. provides no support for the Examiner's allegation.

At paragraph 0014, Corneille et al. discloses:

The mobile provisioning tool system provides security to prevent users from accessing accounts or services other than their own. Users will access the system using credentials stored in an Active Directory (AD), which will restrict the user's access to data relevant only to the business roles they are authorized to use. The mobile provisioning tool system is integrated with the connector gateway, which allows carriers to provide mobile users controlled and metered access to servers on remote company networks.

In this section, Corneille et al. discloses a mobile provisioning tool system that prevents users from accessing accounts or services other than their own. This section of Corneille et al. does not, by itself, disclose any of the three determinations recited in claim 23. At paragraph 0241,

however, Corneille et al. discloses that the connector gateway receives a request for a business service (such as Exchange) from an end user. In light of this disclosure, the section reproduced above can, at best (though Applicants do not concede this point), correspond to making a first determination of whether the first entity is permitted to request performance of the service corresponding to the service name.

The section reproduced above discloses nothing that can reasonably correspond to making a second determination of whether an argument (that includes data used to perform the service) is permitted to be provided by the first entity, or making a third determination of whether the argument (that includes data used to perform the service) is permitted to be requested for the service corresponding to the service name. In other words, assuming, for the sake of argument, that the end user corresponds to a first entity, that the business service requested by the end user corresponds to a service corresponding to a service name, and that the source IP address of the mobile device corresponds to an argument, as alleged by the Examiner (Office Action, pages 7-8) (points that Applicants do not concede), Corneille et al. does not disclose or remotely suggest making a determination of whether the source IP address of the mobile device is permitted to be provided by the end user, or making a determination of whether the source IP address of the mobile device is permitted to be requested for the business service requested by the end user, as would be required by claim 23 based on the Examiner's interpretation of Corneille et al.

Further, Applicants submit that the Examiner's interpretation of Corneille et al. does not even make sense—especially, the Examiner's identification of the source IP address of a mobile device as allegedly corresponding to an argument, included in a received message, that includes

data used to perform a service. Corneille et al. does not disclose or remotely suggest that the IP address of the mobile device includes data used to perform a service. Rather, Corneille et al. merely discloses using the source IP address of the mobile device to identify the IP address of the remote customer server to contact to complete a connection (paragraphs 0034 and 0357).

Thus, Corneille et al. does not disclose a service gateway that includes, for example, an access control module to make a first determination of whether a first entity is permitted to request performance of the service corresponding to the service name, make a second determination of whether the argument is permitted to be provided by the first entity, and make a third determination of whether the argument is permitted to be requested for the service corresponding to the service name, as recited in claim 23.

At paragraph 0033, Corneille et al. discloses:

Applications on the user's mobile device will be configured with DNS names that translate to the appropriate addresses on the connector gateway server. DNS communication requests are routed to the connector gateway, which determines if the user is authorized to access the requested service and which corresponding customer server to contact. Multiple connector gateway servers can be logically grouped together to provide one logical connector gateway server, or they can be clustered to provide server redundancy.

In this section, Corneille et al. discloses that the connector gateway determines if the user is authorized to access the requested service. Similar to the disclosure in paragraph 0014, this section of Corneille et al. can, at best (though Applicants do not concede this point), correspond to making a first determination of whether the first entity is permitted to request performance of the service corresponding to the service name. This section discloses nothing that can reasonably correspond to making a second determination of whether an argument (that includes data used to perform the service) is permitted to be provided by the first entity, or making a third

determination of whether the argument (that includes data used to perform the service) is permitted to be requested for the service corresponding to the service name, for at least reasons similar to those provided above. Thus, Corneille et al. does not disclose a service gateway that includes, for example, an access control module to make a first determination of whether a first entity is permitted to request performance of the service corresponding to the service name, make a second determination of whether the argument is permitted to be provided by the first entity, and make a third determination of whether the argument is permitted to be requested for the service corresponding to the service name, as recited in claim 23.

At paragraph 0129, Corneille et al. discloses:

The connector gateway 104 may also provide several technical benefits. It can integrate with RADIUS session LDAP to control access based on device IP. Service access control may be based on a user profile stored in a secure SQL database, which prevents company A user from getting access to company B server. Access may be controlled by the company IT Admin via a secure website. It logs traffic for auditing and billing purposes. It can automate configuration and tie closely with the database 120. The connector gateway 104 may be built on top of Microsoft's Internet Security Acceleration Server, providing additional firewall, if necessary.

In this section, Corneille et al. discloses that service access control may be based on a user profile stored in a secure database, which prevents company A user from getting access to company B server. Similar to the disclosures in paragraph 0014 and 0033, this section of Corneille et al. can, at best (though Applicants do not concede this point), correspond to making a first determination of whether the first entity is permitted to request performance of the service corresponding to the service name. This section discloses nothing that can reasonably correspond to making a second determination of whether an argument (that includes data used to perform the service) is permitted to be provided by the first entity, or making a third

determination of whether the argument (that includes data used to perform the service) is permitted to be requested for the service corresponding to the service name, for at least reasons similar to those provided above. Thus, Corneille et al. does not disclose a service gateway that includes, for example, an access control module to make a first determination of whether a first entity is permitted to request performance of the service corresponding to the service name, make a second determination of whether the argument is permitted to be provided by the first entity, and make a third determination of whether the argument is permitted to be requested for the service corresponding to the service name, as recited in claim 23.

Because Corneille et al. does not disclose a service gateway that includes an access control module to make a first determination of whether a first entity is permitted to request performance of the service corresponding to the service name, make a second determination of whether the argument is permitted to be provided by the first entity, and make a third determination of whether the argument is permitted to be requested for the service corresponding to the service name, Corneille et al. cannot disclose a service gateway that includes a second interface module to selectively request performance of the service by the second entity based, at least in part, on results of the first, second, and third determinations of the access control module, as further recited in claim 23.

The Examiner alleged that Corneille et al. discloses these features and cited paragraph 0357 of Corneille et al. for support (Office Action, page 8). Applicants submit that the disclosure of Corneille et al. provides no support for the Examiner's allegation.

At paragraph 0357, Corneille et al. discloses:

The connector gateway 104 works by listening for requests from mobile devices 102. When a request is received from the mobile device 102, the connector

gateway 104 performs a lookup to determine which customer server 5000 the connector gateway 104 should contact to complete the connection between the mobile device 102 and the customer server 4900. To do this, the connector gateway may do the following: 1) determine the MSISDN using the source IP through a RADIUS server query; 2) determine the connector type and the service ID using the user's MSISDN and server IP used by the mobile device 102 on the initial request; and 3) determine the remote customer server IP using the service ID.

In this section, Corneille et al. discloses that the connector gateway uses the source IP address of a mobile device to determine the IP address of the remote customer server to contact to complete a connection. Nothing in this section, or any other section, of Corneille et al. reasonably corresponds to selectively requesting performance of a service by a second entity based, at least in part, on results of a first determination of whether a first entity is permitted to request performance of the service corresponding to the service name, a second determination of whether the argument is permitted to be provided by the first entity, and a third determination of whether the argument is permitted to be requested for the service corresponding to the service name. Thus, Corneille et al. does not disclose a service gateway that includes a second interface module to selectively request performance of the service by the second entity based, at least in part, on results of the first, second, and third determinations of the access control module, as recited in claim 23.

For at least these reasons, Applicants submit that claim 23 is not anticipated by Corneille et al. Claims 1, 8-12, 24, and 33 depend from claim 23 and are, therefore, not anticipated by Corneille et al. for at least the reasons given with regard to claim 23.

Independent claim 26 recites features similar to, yet possibly different in scope from, the features identified above with regard to claim 23. Thus, claim 26 is not anticipated by Corneille et al. for at least reasons similar to reasons given with regard to claim 23. Claim 27-29 depend

from claim 26 and are, therefore, not anticipated by Corneille et al. for at least the reasons given with regard to claim 26.

Independent claim 31 recites features similar to, yet possibly different in scope from, the features identified above with regard to claim 23. Thus, claim 31 is not anticipated by Corneille et al. for at least reasons similar to reasons given with regard to claim 23. Claim 16, 20-22, and 34 depend from claim 31 and are, therefore, not anticipated by Corneille et al. for at least the reasons given with regard to claim 31.

Independent claim 35 recites features similar to, yet possibly different in scope from, the features identified above with regard to claim 23. Thus, claim 35 is not anticipated by Corneille et al. for at least reasons similar to reasons given with regard to claim 23.

Accordingly, Applicants respectfully request the reconsideration and withdrawal of the rejection of claims 1, 8-12, 16, 20-24, 26-29, 31, and 33-35 under 35 U.S.C. § 102(e) based on Corneille et al.

*REJECTION UNDER 35 U.S.C. § 103 BASED ON  
CORNEILLE ET AL., AND HOCHMUTH ET AL.*

In paragraph 4 of the Office Action, the Examiner rejected claims 2 and 18 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Corneille et al. in view of Hochmuth et al. Applicants traverse the Examiner's rejection.

Claim 2 depends from claim 23, and claim 18 depends from claim 31. Without acquiescing in the Examiner's allegations with regard to claims 2 and 18, Applicants submit that the disclosure of Hochmuth et al. does not cure the deficiencies in the disclosure of Corneille et al. identified with regard to claims 23 and 31. Therefore, claims 2 and 18 are patentable over



Corneille et al. and Hochmuth et al., whether taken alone or in any reasonable combination, for at least the reasons given with regard to claims 23 and 31.

Accordingly, Applicants respectfully request the reconsideration and withdrawal of the rejection of claims 2 and 18 under 35 U.S.C. § 103(a) based on Corneille et al. and Hochmuth et al.

#### *CONCLUSION*

In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's reconsideration of the application and the timely allowance of claims 1, 2, 8-12, 16, 18, 20-24, 26-29, 31, and 33-35.

As Applicants' remarks with respect to the Examiner's rejections overcome the rejections, Applicants' silence as to certain assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, reasons for modifying a reference and/or combining references, assertions as to dependent claims, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to dispute these assertions/requirements in the future.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,  
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